

November 25, 2020

Contra Costa County Supervisor Karen Mitchoff, Chair  
Association of Bay Area Governments, Regional Planning Committee  
Bay Area Metro Center  
375 Beale Street, Suite 800  
San Francisco, CA 94105

**Re: Regional Housing Needs Allocation – Concerns About Recommended Housing Methodology**

Dear Supervisor Mitchoff,

The San Mateo County Planning and Building Department (Department) is writing to express its concern regarding the housing allocation to unincorporated San Mateo County proposed in the recommended housing allocation methodology, Option 8A, for the Regional Housing Needs Allocation (RHNA) Cycle 6. The proposed allocation presents significant practical issues for the County and has the potential to exacerbate climate change and negatively impact the County's open space, natural resources, and coastal areas. Thank you in advance for considering these comments.

The Department recognizes the magnitude of the housing crisis faced by the State, the Bay Area, and San Mateo County as a whole, and strongly supports Plan Bay Area's goals of incentivizing planning for sufficient housing to meet the region's needs, in ways equitable for all residents. The Department shares those goals. To that end, San Mateo County has been proactive in seeking housing solutions, both for the unincorporated areas, and for interjurisdictional solutions in collaboration with the County's incorporated partner cities. The County's Housing Department is a significant funder of housing for jurisdictions throughout San Mateo County and has provided financing to support development of 3,300 units affordable to low, very low, and extremely low income households since the advent of the County's Affordable Housing Fund in 2014. Half of those units are occupied or in construction, with another 1,700 in predevelopment. The County has also sponsored a number of initiatives, including the Home for All initiative and the 21 Elements collaborative, to work across jurisdictions to advance policies and strategies to increase the production, availability and affordability of housing Countywide.



The County has also aggressively promoted the creation of new housing in unincorporated areas, among other ways by incentivizing development of accessory dwelling units, rezoning for high density residential development, aggressively permitting affordable housing proposals, and adopting inclusionary housing requirements and affordable housing impact fees. San Mateo County supports all efforts to increase the availability and affordability of housing. However, the Department also recognizes that the location of such housing is critically important, and we are concerned that the allocation in the currently proposed methodology will create significant pressure to rezone non-residential, primarily undeveloped lands for residential uses.

A very large percentage of the land area within the unincorporated County remains undeveloped due to access, natural hazards, and infrastructure limitations, and because they are protected agricultural and resource management lands. The largest landowner in the County is the San Francisco Public Utilities Commission, whose watershed lands are undevelopable. The very limited amount of land within the County that is potentially available for development are highly constrained. Developing these areas would present significant challenges, and cause significant negative impacts, including:

- Loss of natural habitat and infringement on protected, threatened, or endangered resources.
- Loss of agricultural lands, including active farms and ranches.
- Increased fire danger. As the past few years have demonstrated, development in the County's rural areas is increasingly threatened by and will continue to face ever-greater fire danger, making development of these areas increasingly untenable.
- Overburdening available infrastructure. The County's rural lands are served by septic systems and well water, and are disconnected from the County's road and transit systems and other services.
- Impacts to coastal resources. San Mateo County has an extensive Coastal Zone, within which development is highly regulated and extremely constrained. Like the County's other rural areas, much of the Coastal Zone is disconnected from municipal services. Even the County's small urban coastal areas face strict limits on available water and other services. In areas directly adjacent to the coastline, coastal erosion and sea level rise are increasingly infringing on formerly developable lands, as well as threatening existing development. Development within the Coastal Zone is strictly constrained by the California Coastal Act and the County's Local Coastal Program (LCP), including voter-initiated growth limits within the County's LCP that cannot be amended without a Countywide referendum, preventing significant densification in even the existing urban areas in the County's Coastal

Zone.

The climate impacts of new development in undeveloped unincorporated areas are also significant, as development in many of these areas could generate long commutes to jobs and services, as well as require the expenditure of great deals of energy to create and maintain the new infrastructure that would be required to serve them.

For these reasons, the Department believes that the priority for any housing policies should be the promotion of compact, transit-oriented, infill development or redevelopment in the urbanized core of the San Mateo County Peninsula. Such development is consistent with the objectives in State housing element code, Gov. Section 65584(d)(2):

*(2) Promoting infill development and socioeconomic equity, the protection of environmental and agricultural resources, the encouragement of efficient development patterns, and the achievement of the region's greenhouse gas reductions targets provided by the State Air Resources Board pursuant to Section 65080.*

In addition, this type of development is most consistent with the goal of Plan Bay Area, per Senate Bill 375, to reduce greenhouse gas emissions by focusing housing near jobs and transit.

However, while the Department supports development that meets these criteria, the urbanized unincorporated areas of San Mateo County make up only a small fraction of County territory, and are primarily located within the boundaries of incorporated cities. These areas are limited in size, and are in many cases already zoned to the maximum densities that can be supported by infrastructure.

In addition, the County relies on external service providers to provide water, wastewater, and other services to these areas, and has no independent ability to increase service capacity. In North Fair Oaks, for example, a Priority Development Area that the County has significantly up-zoned in recent years consistent with the adopted North Fair Oaks Specific Plan, emerging wastewater constraints may prohibit development even at the densities allowed by the newly adopted zoning, unless the County can obtain additional wastewater service capacity. Similar conditions pertain in other unincorporated urbanized areas, including the Harbor Industrial, Broadmoor, Sequoia Tract, and Devonshire communities.

The Department does not take issue with the composition of the proposed allocation by affordability level. Our concern is the magnitude of the total allocation, and its likelihood to necessitate greenfield development outside of the County's urbanized areas. We would

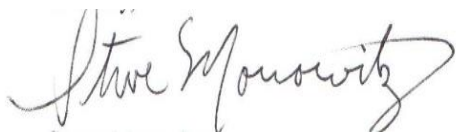
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note that while the County's proposed housing allocation under Option 8a is 2,933 units, approximately three times the final allocation during the last Housing Element Cycle, the County's allocation from ABAG/MTC in the 2014 – 2022 RHNA cycle was initially only approximately 300 units in total. The County subsequently voluntarily accepted 600 additional units from incorporated cities, as part of the sub-regional allocation process then in effect. The current proposed allocation is nine times the allocation arrived at by ABAG/MTC as part of Plan Bay Area analysis in Cycle 5. An allocation of this size seems certain to necessitate development in formerly undeveloped areas of the County. Such development would be in conflict with the Plan Bay Area Priority Conservation Area program.

Again, The Department recognizes that Plan Bay Area strives to balance growth in the built environment and the protection of natural resources, as well as addressing the needs of residents throughout the region. However, given the potentially grave negative impacts of development outside of urban infill areas, the County strongly urges reconsideration of the proposed allocation, and consideration of the number of housing units that can be realistically accommodated primarily in these areas.

The San Mateo County Planning and Building Department has many resources available to further document these points, and its staff would welcome the opportunity to collaborate with ABAG on an allocation number that is aggressive, realistic, and environmentally sound. Thank you for considering this offer and the comments contained in this letter. Please feel free to contact me if you have questions or if you would like to discuss these matters further.

Sincerely,

A handwritten signature in cursive script that reads "Steve Monowitz". The signature is written in black ink and is positioned below the "Sincerely," text.

Steve Monowitz  
Community Development Director